

BD will use current PA citations

1 of 3

- * Where do we send \$ from penalties
- * check on addresses.

Bit-Dry Violation

Evidence

Comment

1. Failure to make a
haz determination/waste analysis

(262.11 + 268.7(a))

75.262(h)
record keeping

- (1) EPA sampling results (see tag 1)
- (2) Commercial discarded products
by using inventory provided (see tag 3)

- (1) Conditions of drums
(tag 2) blows away argument
of raw material vs waste
- (2) cost:
262.11 -
- (3) PA authorized requires
to keep them for 20 yr

2. Storage w/o Permit

270.1(c) / 268.50

75.270(a)

- (1) storage for ≥ 90 days - 262.34(b)
+ stated in EPA inspec. report (see tag 4)
+ stated in PA DEP inspec. report (see tag 5)
+ EPA's inspections

- (2) Containers not labeled + dated
(262.34(a)(2) + (3)) (See pictures tag 2)
+ 2

- (1) cost:

To acquire a storage
permit costs 14,000 in PA
acc. to PA DEP

- (2) EPA's inspections:

* 12/11/95 $\Rightarrow \geq 90$ days
* 4/9/95

- (3) Containers not in compliance w/:

- Sub I:

- * poor conditions (see tag 2) + 2
- * open (see tag 2)
- * not inspected (no records on file)
- * ignitable waste not 50 ft
away from fac. boundary

- Sub J:

- * No assess of tank integrity
- * No inspections
- * Ignitable waste inside tanks

3. Failure to apply for
EPA Id. No.

(264.11)

75.262.12

- * Review of our records
shows no EPA Id No for
Bit-Dry
- * Check w/ PA DEP

4. Failure to make general
waste analysis + waste analysis plan

(264.13(a) + (b))

265.13(a)(1) 265c

- * No documentation kept
on file at fac.

- * check w/ PA DEP
- * per our inspection

5. No security system in
place (264.14)

- * Fac. is easily accessible even fenced.
- * No guard on duty
- * No signs.

Violation

Evidence

6. Failure to have
a written schedule for
general inspections at fac

264.15 (b)(1) & (2)
265 (e)

*PADEP ask
them

7. Failure to provide
training for personnel
(264.16)

(F)(6) - keep records of
training

*No records on personnel
+

8. No precautions taken
for ignitable waste
(264.17)

*No records of documentation
(264.17(c))
may be tough to prove

- NO

9. Preparedness + Prevention
(264.30)

* No comm. system in the
area of drums (264.34)

(264.34)???

* No arrangement w/ locals - Contact locals
(264.37)

* No aisle space (264.35)

10. Contin Plan
(264.51)

* No cont. Plan in files
PADEP

11. No operating record
(264.73)
(K)

Nothing in their files

12. Records not available
(264.74)

not applicable

13. No Biennial Report
(264.75)

* EPA's database doesn't
show a BR by Bil-Dry
as of 1993.

$\frac{kg}{100} = gal$

14. Failure to have
a written Closure Plan
(264.112)

15. Financial Requirements

not in file

(a) Detailed written cost
for closure (264.142)

(b) Financial Assurance
for closure (264.143)

(c) Liabilities (264.147)

16. Management of Containers

(a) Poor Conditions
(264.171)

* see pictures tag 2 + 2'

(b) Cont. open
(264.173)

(c) Inspections
(264.174)

(d) Containment
(264.175)

* Although drums were over
a concrete pad the area is
not prepared to contain a spill.

(e) Ignitable waste were
within fac. property boundary
(264.176)

17. Management of Tanks

(a) No written assess on
tanks integrity

(264.91)

(b) No inspections

(264.195)

(c) Ignitable waste
contained in tanks

(264.198)

Economic Benefit - Supplement to Penalty Calculation

1. Hazardous Waste Determination (262.11)

* Make a deter. using process knowledge for 1 waste \$ 710[±]

* Make a deter using TCLP for 1 waste \$ 1,190

According to EPA's sampling results at least 4 different h.w. were found on-site. Assuming that at least 4 h.w. determinations were required at Bil-Dry, the cost would be \$ 7,600
 2380 (1993) < 2,500

2. Storage w/o Permit (270.1)

Based on conversations w/ PADEP on 6/24/96, to apply for a non-commercial (i.e. store your own waste) storage permit costs \$ 14,000 (1995)

3. EPA Id. No (264.11)

No cost associated w/ getting EPA Id No.

4-16 The whole initial + on-going costs of maintaining a medium TSD in compliance w/ RCRA is:

Initial: \$112,300

on-going: \$16,800

1 Info taken from "Estimating Costs for the Econ. Benefits of RCRA Compliance." by Office of Waste Programs Enf., dated May 1993

PENALTY COMPUTATION WORKSHEET

Company Name: Bil-Dry Corporation

Address: 5525 Grays Avenue
Philadelphia, PA 19143

I. Requirement violated: 40 CFR 262.11 Hazardous Waste Determination

PENALTY AMOUNT FOR COMPLAINT

- | | | |
|-----|--|-----------|
| 1. | Penalty Based Penalty from Matrix..... | \$25,000 |
| | (a) Potential for Harm..... | major |
| | (b) Extent of Deviation..... | major |
| 2. | Select an amount from the multiday matrix cell.... | \$5,000 |
| 3. | Multiply line 2 by the number of days of violation
minus 1..... | \$245,000 |
| 4. | Add Line 1 and 3..... | \$270,000 |
| 5. | Percent increase/decrease for good faith..... | N/A |
| 6. | Percent increase for willingness/negligence..... | N/A |
| 7. | Percent increase for history of non compliance.... | N/A |
| 8. | Total lines 5 thru 7..... | N/A |
| 9. | Multiply line 4 by line 8..... | N/A |
| 10. | Calculate Economic Benefit..... | \$7,600 |
| 11. | Add lines 4, 9 and 10 for penalty amount to be
inserted in the complaint..... | \$277,600 |

NARRATIVE EXPLANATION TO SUPPORT COMPLAINT AMOUNT

1. Gravity Based Penalty:

(a) Potential for Harm:

A hazardous waste determination was not performed on approximately 200 drums. This action may leads to improper management of the waste creating unnecessary exposure/harm to workers that handle this waste. Additionally this omission could lead to inappropriate disposal endangering human health and the environment.

(b) Extent of Deviation:

To avoid making a hazardous waste determination ultimately avoids complying with the complete array of regulations for the management of hazardous waste. A hazardous waste determination is the backbone of the whole hazardous waste management program at a Facility. To ignore this requirement constitutes a major deviation from the RCRA requirements.

© Multiple/Multi-Day:

There is not enough evidence to determine when this material became a waste. Since these materials were considered commercial products at some point, EPA would have to know when to consider this product as a discarded commercial waste. However, during the EPA inspection of December 11, 1995 these drums were in such poor conditions that they will be considered a waste. During the inspection of April 9, 1996 the drums were still at Bil-Dry. Therefore, EPA had determined that enough information is available to base the penalty on the period from December 11, 1995 thru April 9, 1996. This period contains 140 days. Of these 140 days, Bil-Dry would have been exempt from regulation the first 90 days. Therefore, the penalty will be based on 50 days of non-compliance.

10. Economic Benefit:

The economic benefit involved in making a hazardous waste determination is \$7,600. See P.5 of tech referral for breakdown.

II. Requirement violated: 40 CFR 270.19[©] Storage of Hazardous Waste without a permit

PENALTY AMOUNT FOR COMPLAINT

1. Penalty Based Penalty from Matrix..... \$8,000
 - (a) Potential for Harm..... moderate
 - (b) Extent of Deviation..... major
2. Select an amount from the multi day matrix cell.... \$2,200
3. Multiply line 2 by the number of days of violation minus 1..... \$107,800
4. Add Line 1 and 3..... \$115,000
5. Percent increase/decrease for good faith..... N/A
6. Percent increase for willingness/negligence..... N/A
7. Percent increase for history of non compliance.... N/A

8. Total lines 5 thru 7..... N/A
9. Multiply line 4 by line 8..... N/A
10. Calculate Economic Benefit..... \$14,000
11. Add lines 4, 9 and 10 for penalty amount to be
inserted in the complaint..... \$129,800

NARRATIVE EXPLANATION TO SUPPORT COMPLAINT AMOUNT

1. Gravity Based Penalty:

(a) Potential for Harm:

Storing a hazardous waste without a permit would not pose a harm to human health or the environment. However, to avoid applying for a storage permit avoids following the requirements of a storage facility, thus posing a potential thread.

(b) Extent of Deviation:

This entails complete avoidance of RCRA regulation for the handling of a hazardous waste.

(c) Multiple/Multi-Day: See previous violation.

10. Economic Benefit:

The economic benefit derived from storing hazardous waste w/o a permit is the amount necessary to get a storage permit. Based on conversations with PADEP this amounts is \$14,000 for a non-commercial facility.

III. Requirement violated: 40 CFR 264 Compliance with Storage facility requirements.

PENALTY AMOUNT FOR COMPLAINT

1. Penalty Based Penalty from Matrix.....\$25,000
 - (a) Potential for Harm..... major
 - (b) Extent of Deviation..... major
2. Select an amount from the multi day matrix cell.... \$5,000
3. Multiply line 2 by the number of days of violation
minus 1..... \$245,000
4. Add Line 1 and 3..... \$275,000
5. Percent increase/decrease for good faith..... N/A
6. Percent increase for willingness/negligence..... N/A

7. Percent increase for history of non compliance.... N/A
8. Total lines 5 thru 7..... N/A
9. Multiply line 4 by line 8..... N/A
10. Calculate Economic Benefit..... \$129,100
11. Add lines 4, 9 and 10 for penalty amount to be inserted in the complaint..... \$404,100

NARRATIVE EXPLANATION TO SUPPORT COMPLAINT AMOUNT

1. Gravity Based Penalty:

(a) Potential for Harm:

To avoid compliance with all the requirements of as storage facility poses a major thread to human health and the environment. This provisions are designed to protect not only workers but potential trespasser and the general public from spills and/or emergencies at a facility. Additionally this provisions are a tool to prevent illegal disposal of hazardous waste.

(b) Extent of Deviation:

All requirements under part 264 of RCRA were ignored.

10. Economic Benefit:

The economic benefit derived from ignoring RCRA requirements for a TSD is \$129,100. See p.5 of tech referral for breakdown.

The total proposed penalty for the Bil-Dry facility is \$811,500.

GLENN R. MATECUN
Attorney at Law
3505 West Grand River
Howell, Michigan 48843

Telephone (517) 546-8269
Facsimile (517) 548-5162

November 19, 1996

Ms. Zelma Maldonado
U.S. Environmental Protection Agency
Region III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

Re: 5525 Grays Avenue, Philadelphia, Pennsylvania

Dear Ms. Maldonado:

I represent Bil-Dry Corporation in connection with the above-referenced property and the EPA's request for information from Bil-Dry. This letter is in response to the EPA's letter of August 29, 1996.

Initially, I have some concerns about how your letter is worded and the information it requests. It is my understanding that the authority by which the Department has made its request provides that Bil-Dry must "... furnish information about such wastes" at its property. As you know, we believe that the materials which you are concerned with are not wastes. I would, however, like specific information from the EPA concerning exactly which materials it considers waste, including the specific materials which the EPA considers waste at Bil-Dry's property and the reasons why the EPA believes the material is waste -- i.e., why does the EPA believe the material is not usable?

In addition to the above concerns, I'm sure you understand that your letter is extremely broad, including a request to specifically identify every container stored in certain areas for the last 10 years. I have done my best to gather the information you requested and have attached copies that information to this response. However, nothing in this response should be taken as an admission that Bil-Dry has stored hazardous waste at its property, and all of the following answers assume that the materials at Bil-Dry's property are usable and, therefore, not wastes.

Answers To Specific Requests For Information

1.

a. See attached inventory list, which was previously provided to the EPA. As to the amounts of each material, the attached inventory includes the beginning amounts, although the material may have been used over time. As you know, this request asks for information concerning materials for which we no longer have records, because no such records are required to be kept. The area in referred to in question 1 is a part of the facility where materials are stored so that those materials that are consumed in the planned production for the day may be readily accessed, and those that need temperature controlled environments are stored in a more controlled location. The materials that were stored in the area listed in question 1 include the following: (i) raw materials listed on the inventory given to representatives of the EPA during their visit to the facility on April 1, 1996 (the maximum volume and number of containers is shown on the inventory listing, and as materials are utilized the volume and number of containers goes down; (ii) overage of finished goods (goods generated when batch sizes exceed fill time and requirements (the volume and number of drums is not recorded by Bil-Dry, as the materials are only stored temporarily until they are used to make finished goods); (iii) low usage materials whose storage in other locations could lead to leakage or spills due to the traffic that would then occur within their storage areas (the volume and number of drums is a constantly changing, so I cannot give you a specific volume of these materials stored).

b. I believe that if the EPA would review the inventory list, it would find that the materials stored in the containers are useable in the production of paints (including boat and cement paint), floor and wall coverings, box glues and adhesives, concrete/cement sealers, asphalt patching and sealing, wall paper adhesives, and concrete/cement stain removers.

c. Bil-Dry generated and/or produced the "overage materials" which was stored in drums to be packaged into finished goods. With respect to the attached inventory, the generator or producer of the materials in the containers was Harrod Paint Company, the company which occupied the property prior to Bil-Dry. With respect to all of the other raw materials identified in 1.a, above, there are numerous suppliers of those materials as identified on the attached list.

d. With respect to the materials generated by Harrod Paints, the date of acquisition was approximately 1987, but the contents of the containers has not remained the same from that date until the present. With respect to the other materials, the raw materials were purchased as needed, but the exact dates of purchase are unknown.

e. The materials were purchased from the generator or producer, as set forth in response to 1.c, above.

f. Use in the production of masonry paints, wall and floor coatings, and products identified in 1.b, above.

g. The use of the products has been ongoing, since Bil-Dry occupied the property. Actual dates and usage amounts are impossible to know because Bil-Dry does not keep such records.

h. Bil-Dry has no records of the condition of the drums. No one at Bil-Dry has ever removed any markings or labeling from the drums, so the coding on the drums has remained the same since the time of acquisition. However, at times markings have been added to drums for identification purposes.

i. The condition of the drums was generally good. No drum was leaking. Drums were labeled with codes referred to by the inventory, or by labels. Drums were covered to protect the material from the elements. There was some rust on the exterior of the drums and some of the drums may have been dented, but the drums and the material contained inside was fine.

j. All sound drums have remained the same, while any drum of questionable soundness, even though more than adequate to contain the material, has been transferred to a newer drum and coded to maintain recognition of the material involved. This activity was one of the voluntary measures that Bil-Dry undertook to address concerns cited by the Commonwealth of Pennsylvania.

k. Duration of the containers varies, but for each it is no more than 9 years. The main purpose of the storage was to use the materials for the production of finished goods. The location of the storage was to minimize the possibility of leakage (they were kept out of high traffic areas) and to protect employees and property by storing potential fire hazards outside in accordance with fire codes and OSHA requirements.

l. Samples were pulled in order to do laboratory tests to determine additional uses of the materials besides those uses for which the material was purchased. This was done sometime in 1993, but there are no specific records. There was also testing performed in 1994 and 1995 on the materials for the same reasons, but no records exist.

m. See attached results of tests which were performed after Bil-Dry began receiving pressure from the EPA. Rather than getting into a dispute with the EPA, Bil-Dry decided that the better alternative would be to have the drums tested for disposal and disposed.

n. George Sode, 3505 West Grand River, Howell, Michigan 48843. A company called REI, located in Cleveland, Ohio. A company called Clean Harbors, located in New Jersey.

2. Bil-Dry has manifests for disposal of the materials in the drums. Bil-Dry's copier is out of order and there is no way to copy the manifests at this point. We will copy as soon as possible (most likely tomorrow) and send them under separate cover.

3. See manifests identified in Number 2, above.

4. See manifests identified in Number 2, above.

5. Joe Mazza (at Bil-Dry's facility); William Rodgers, President (Fort Pierce, Florida); Neil Dalanger (former employee, no address); Scott Frey (former employee, no

address); since the materials were used in some of Bil-Dry's production processes, it is likely that, at one time or another, all employees have used the materials in the drums. It is not possible to say exactly who and when, however.

6. Bil-Dry cannot locate any such documents, but is still reviewing many old files to see if some such documents exist.

7. Drums were coded, and inspectors were told to refer to the codes on the inventory sheet that they had been provided.

8. See attached inventory list, which was also given to the EPA at the inspection.

9. Bil-Dry cannot locate the documents relating to the purchase of the facility or equipment, but will continue to look for such documents. The only document which Bil-Dry has is the material inventory which is attached and which has already been provided to the EPA.

10. Bil-Dry is unaware of any such releases at the property.

11. Bil-Dry has no such documents.

12. Bil-Dry has had all material removed from the USTs and disposed. Bil-Dry has had all drums sampled for analysis in order to dispose of the material. Approximately 150 drums have been disposed and approximately 110 remain pending analysis for disposal.

13. The manifests will be provided as soon as copies are available.

14. The storage of drums in any specific location was an attempt to locate like drums with like drums. For example, paints were located with paints, epoxies with other epoxies, etc.

15. Bil-Dry has no such documents.

16. Bil-Dry does not have any information as to which drum the EPA is calling EPA Drums #1 - #7. Please provide the codes, labels, or temporary drum numbers that were on the drums at the time of the inspection so that we can make an appropriate reply.

17. These documents will be provided with the response to Number 16, above.

18. As noted earlier, Bil-Dry believes that the materials at issue were at all times usable. As part of Bil-Dry's proposal to the Commonwealth, Bil-Dry agreed to dispose of the material. The determination that the materials were to be disposed was made when Bil-Dry received approval codes and pricing from REL. These dates vary with the streams, but were approximately 1-2 weeks prior to the manifest and shipping dates. The containers for which the determinations have been made and their contents and amounts are as shown on the disposal manifests. The location of the containers was in the opened-roof area or adjoining gray shed. This question seeks specific information, and Bil-Dry only has general knowledge and has responded as complete as possible.

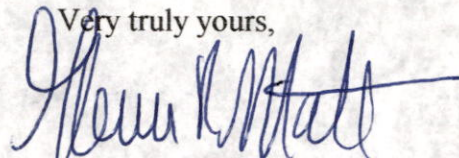
19. Bil-Dry has provided safety and health training as required by OSHA. Other than that, no specific training has been performed.

20. No such documents exist.

21. Units are the same as used in the price per unit column, which is listed on the inventory sheet.

I hope this information satisfies your requests. If you would like to discuss this information further, please let me know.

Very truly yours,



Glenn R. Matecun

Alma's playing copy

BIL-DRY CORPORATION

Corporate Office
3505 W. Grand River
Howell, Michigan 48843

Telephone: (517) 546-8269

Telecopier: (517) 548-5162

Neil R. Bigioni, Esquire
Assistant Regional Counsel
United States EPA
841 Chestnut Street (3RC32)
Philadelphia, Pennsylvania 19107

Re: Bil-Dry Corporation Response Letter

Dear Mr. Bigioni:

This letter is in response to your letter dated December 6, 1996. Initially, we believe that our response was adequate given the breadth of your requests and the information we have to work with. We did not attach exhibits to our original response because of copier problems. The copier is working now and the exhibits are attached. The following is an item-by-item response to your comments and requests:

1. Your assumption is correct, that the inventory list referred to in our letter is the list previously submitted to the inspectors at the time they visited Bil-Dry.

With respect to the "raw materials" issue, (A) all of the materials are raw materials (to clarify "overage", this refers to unpackaged finished goods, i.e., material awaiting packaging for any number of different reasons which I would be glad to discuss with you); (B) No, these materials are not referenced in the inventory previously submitted. The inventory previously submitted is the inventory of the Harrod Paint material only, as we already said in our response to 1(c). Other raw materials are purchased from various suppliers, as shown on the attached list of suppliers (Exhibit 1(b)); (C) The materials reflected on the previously submitted inventory are Harrod Paint materials only; (D) There is no date on the inventory -- it most likely dates back to when the purchase took place, sometime in late 1985 or early 1986; (E) I am somewhat confused at your statement that question 1.a. requests the materials currently stored in the open roofed area or connected yard, not stored there at some indeterminate past time. The question directly from the letter is:

For each container which is now, or was at any time since acquisition of the Facility by Bil-Dry, stored in the open roofed structure or connecting open yard . . .

- Do we need to answer this.

Drums inside shed only?

* Did we mean the whole area including shed + paved area?

(F) We have disposed of materials, as specifically set forth in our letter to the Commonwealth of Pennsylvania, which was also sent to the EPA. The quantity has changed: (a) The materials which are no longer present have either been disposed as shown by the attached manifests or used in Bil-Dry's production; (b) No materials have been added to either of the areas;

(G) "Overage materials" are defined in our original letter and above in 1(A), but maybe an example will help clarify this term. These materials are finished goods which have not yet been packaged. For example, consider this scenario: Bil-Dry has an order for 20 drums of adhesive. After packaging the batch, Bil-Dry ends up with an extra 1/2 drum, which was not ordered by the customer. This extra 1/2 drum of material is what we term "overage" and is stored until the next batch of adhesive is ordered, at which time it is either introduced into the batch or the 1/2 drum is completely filled. That is what we consider "overage".

2. Based on a review of the materials, Bil-Dry developed attached Exhibit 1(e) which breaks the materials down into several categories, for testing and evaluation, based upon the type of material and the anticipated use of the materials. The following are descriptions of each category:

Solvents: Solvents are referenced by an "S" code on attached Exhibit 1(e). Solvents are currently used in Concrete Stain Remover and also to vary the consistency in Asphalt Crack Filler. Solvents are also used generally as paint thinners as needed. Prior products in which solvents were used are Masonry/Concrete Stain and Silicone Clear Penetrating Water Repellent Treatment, which are not currently being produced by Bil-Dry. A further use of the solvents is in producing paints for Bil-Dry's own use at the property. Finally, Bil-Dry has been in the paint business and has always intended to extend its current product line with additional paints which utilize solvents.

Resins: Resins are referenced by an "R" code on attached Exhibit 1(e). Resins are not currently used in Bil-Dry's production, but were used in the past in Masonry/Concrete Stain and Silicone Clear Penetrating Water Repellent Treatment. Bil-Dry has been in the paint business and has always intended to extend its current product line with additional paints which utilize these resins.

Mirasol Resins/Solvents: These are identified on Exhibit 1(e) as "M1". These are paint precursors used to make paint. Bil-Dry has been in the paint business and has always intended to extend its current product line with additional paints which utilize these paint precursors.

Miscellaneous Precursors: These are identified on Exhibit 1(e) as "M2". Again, these are miscellaneous paint precursors used to make paint. Bil-Dry has been in the paint business and has always intended to extend its current product line with additional paints which utilize these paint precursors.

4. Based on your questions, there is some clarification needed here. (A) With reference to the previously submitted inventory, all of the drums had markings and no one removed those markings -- what I did not say in my original letter is that we have added coding or markings to the drums since acquisition to group "like" materials together and have a uniform system to reference those drums; (B) In addition to the previously submitted inventory, it is also true that Bil-Dry has not removed markings from any of the drums it has acquired. You ask to "describe in detail" these drums, but it is impossible to do because there have been so many drums in and out of Bil-Dry over the years; (C) With respect to the Harrod Paint drums, the acquisition was in late 1985 or early 1986, as stated above. With respect to all other drums at Bil-Dry's facility, again, it is impossible to determine acquisition dates of all the materials because there have been so many drums in and out of the company; (D) All of the terms are used as means of identifying drums, and I was using the terms interchangeably.

5. See attached Exhibit 5, which are the test results.

6. I have great concern over your statement. We have attached as Exhibit 6 all documents responsive to numbers 2, 3, 4 and 13 in your previous letter. However, we still cannot specifically identify the drums you call EPA #1-7. Your letter says that Bil-Dry was instructed not to remove the tags or the drums. This is not true according to George Sode who was at the inspection. In fact, this is totally inconsistent with the May 30, 1996 letter from the Pennsylvania Department of Environmental Protection which demanded that Bil-Dry dispose of all of the material. This letter was copied to Ms. Zelma Muldanato of the EPA (See attached Exhibit 6A).

7. As set forth in 6, above, I believe the material in the drums has been disposed. We have no problem identifying them if you can give us detail on the drum markings. These markings were pointed out to inspectors and the inspectors were told at the time to refer to the inventory, and I would assume they have notes on which EPA # matched with which drum number.

You have asked for a significant amount of information over a long period of time and I have done my best to respond in full. If you have other specifics which you would like to know, please let me know. Also, I made certain requests of the EPA in my

letter, but none of those requests were answered. Specifically, I believe that it is only fair that you let me know the following information:

1. Exactly what materials do you consider wastes and which materials does the EPA believe were hazardous wastes?

2. For each material identified in number 1, above, why does the EPA believe that the material is a waste -- that is, how come the EPA believes the material is unusable?

You have made extremely serious allegations against Bil-Dry, and the resulting penalty would put us out of business. I think it is only fair that you give me details of why you have done this.

* * *

Based on the fact that you have not given me details of what you consider hazardous wastes and why, I do not believe that it would be productive at this time to go forward with the settlement conference which was scheduled for December 18, 1996. Maybe we can reschedule the conference at some later date when it would be more productive. Please call me if you have any questions.

Very truly yours,

BIL-DRY CORPORATION

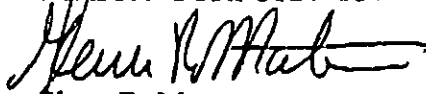

Glenn R. Matecun

EXHIBIT LIST

- EXHIBIT 1(b):** List of Suppliers
- EXHIBIT 1(e):** Drum Listing With Categories
- EXHIBIT 5:** Test Results/Profiles
- EXHIBIT 6:** Disposal Manifests
- EXHIBIT 6A:** Letter from Pennsylvania Dep't of Environmental Protection

(Exhibits sent via
overnight mail - too
many to fax)

ROUTING AND TRANSMITTAL SLIP

Date

11/5/96

TO: (Name, office symbol, room number, building, Agency/Post)

Initials

Date

1.	Zelma Maldonado	344W 100		
2.				
3.				
4.				
5.				

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

REMARKS

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)

Room No.—Bldg.

Begun MC32

Phone No.

5041-102

☆ U.S.G.P.O. 1994 300-891/80021

OPTIONAL FORM 41 (Rev. 7-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.206

ROUTING AND TRANSMITTAL SLIP

Date

TO: (Name, office symbol, room number, building, Agency/Post)		Initials	Date
1.			
2.			
3.			
4.			
5.			

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

REMARKS

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)	Room No.—Bldg.
	Phone No.

5041-102

☆ U.S.G.P.O. 1994 300-891/80021

OPTIONAL FORM 41 (Rev. 7-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.206

**Corporate Office**

3505 W. Grand River Ave.
Howell, MI 48843
(517) 546-8269
(517) 548-5162 fax

Subsidiaries

Set Consumer Products
Stone Mountain Manf. Co.

Other Locations

5525 Grays Avenue
Philadelphia, PA 19143
(215) 724-1000
(215) 729-2195 fax

445 South Elm Street
Calhoun, GA 30701
(404) 625-4551
(404) 629-1861 fax

3908 Selvitiz Road
Ft. Pierce, FL 34981
(407) 465-1115
(407) 464-7263 fax

Product Lines

All-Set
Tile Setting Materials

Bil-Dry
Waterproofing & Patching

DuraGrip
Adhesives

Fiberbond
Surface Bonding Cement

Set Products
Consumer Bldg. Materials

RECEIVED

NOV 6 1996

EPA, Region III, ORC
R&C, PA/MD Section

October 30, 1996

Neil R. Bigioni, Esquire
U.S. E.P.A.
841 Chestnut Building
Philadelphia, PA 19107

Re: Answer and Certificate of Service for Docket No. RCRA-III-264

Dear Mr. Bigioni:

Please find enclosed one copy of Defendant's Answer, Request for Settlement Conference and Request for Hearing along with one copy of the Certificate of Service for the above mentioned matter.

Please call me at (517) 546-8269 if you should have any questions.

Very truly yours,

BIL-DRY CORPORATION

Glenn R. Matecun/MSD

Glenn R. Matecun
General Counsel

enc

cc *Belma Maldonado*

**BEFORE THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III**

In Re:

**Bil-Dry Corporation
5525 Grays Avenue
Philadelphia, Pennsylvania 19143**

Docket No. RCRA-III-264

Answer

Request for Settlement Conference

Request for Hearing

RESPONDENT'S ANSWER

ANSWER TO FINDINGS OF FACT AND CONCLUSIONS OF LAW

1. Admitted.
2. Admitted.
3. Admitted. Bil-Dry Corporation ("Bil-Dry") further avers that it produces and has produced a significant number of other products which are not "grout and cement packaging products" as alleged in the Complaint.
4. Denied as untrue.
5. The terms "owner" and "operator" have specific legal meanings under the statute set forth in the Complaint, but the Pennsylvania statute has not been provided to Bil-Dry. Subject to the foregoing statement, Bil-Dry operates its business on the premises, but does not consider its activities either owning or operating a hazardous waste treatment, storage or disposal facility.
6. Admitted, but Bil-Dry states that no such permit or interim status is required.

7. Bil-Dry admits that an inspection took place, but does not know specifically the nature of inspection.

8. Bil-Dry admits that an inspection took place, but does not know specifically the nature of the inspection.

9. Bil-Dry admits that an inspection took place, but does not know specifically the nature of the inspection.

COUNT I

10. No response is required.

11. The allegation is a statement of law to which no response is required.

12. Bil-Dry admits that there were certain drums at the premises, but does not know exactly how many. Bil-Dry further admits that there are 4 underground storage tanks ("USTs"), but denies that these were ever used or operated by Bil-Dry. Bil-Dry further states that the USTs were locked and sealed prior to Bil-Dry's occupancy of the premises.

13. Denied as untrue.

14. Bil-Dry admits that there were samples taken at the inspection. Bil-Dry neither admits nor denies the remaining allegations because Bil-Dry is not privy to all of the documentation and results relating to samples.

15. Bil-Dry neither admits nor denies the allegations because Bil-Dry is not privy to all of the documentation and results relating to samples.

16. Denied as untrue.

17. Denied as untrue.

18 (a) - (c) The allegations are legal statements to which no response is required.

19. Since the USTs were sealed and locked prior to Bil-Dry's occupancy of the premises, Bil-Dry has no knowledge as to how long any material was in the USTs. Bil-Dry denies that it accumulated the materials. The material in the drums was paint, paint precursors and similar materials which are useful and which were intended for use in Bil-Dry's operations.

20. Bil-Dry denies that the materials are hazardous waste.

21. Denied as untrue, as the materials are not hazardous waste.

22. Denied as untrue.

COUNT II

23. No response is required.

24. The allegation is a statement of law to which no response is required. Bil-Dry affirmatively avers that it knew the materials were not wastes and, therefore, had made such a determination.

25. Denied as untrue.

26. Denied that such determination was required and, further, denied that the material was hazardous waste.

27. Denied as untrue.

COUNT III

- 28. No response is required.
- 29. The allegation is a statement of law to which no response is required.
- 30. Bil-Dry denies that the materials were hazardous wastes.
- 31. Denied as untrue.

COUNT IV

- 32. No response is required.
- 33. The allegations are statements of law to which no response is required.
- 34. Denied as untrue, as such materials were not wastes.
- 35. Denied as untrue, as such materials were not wastes.
- 36. Denied as untrue, as such materials were not wastes.
- 37. Denied as untrue, as such materials were not wastes.
- 38. Denied as untrue, as such materials were not wastes.
- 39. Denied as untrue.

COUNT V

- 40. No response is required.
- 41. The allegations are statements of law to which no response is required.
- 42. Bil-Dry denies that such inspection was necessary, as the materials were not hazardous waste.
- 43. Denied as untrue.

COUNT VI

- 44. No response is required.
- 45. The allegations are statements of law to which no response is required.
- 46. Bil-Dry denies that closure was necessary, as the materials were not hazardous waste.
- 47. Denied as untrue.

COUNT VII

- 48. No response is required.
- 49. The allegation is a statement of law to which no response is required.
- 50. The allegation is a statement of law to which no response is required.
- 51. The allegation is a statement of law to which no response is required.
- 52. Bil-Dry denies that such cost estimate is necessary, as the materials were not hazardous waste.
- 53. Denied as untrue.

COUNT VIII

- 54. No response is required.
- 55. The allegation is a statement of law to which no response is required.
- 56. The allegation is a statement of law to which no response is required.
- 57. The allegation is a statement of law to which no response is required.
- 58. Bil-Dry admits that some of the drums were rusted and that the exterior appearance of some of the drums was poor, but the drums provided adequate containment for the materials stored therein. Shortly after the inspection, Bil-Dry transferred the materials into new and/or reconditioned drums for storage.

59. Based on an inspection performed by Bil-Dry prior to the inspection, Bil-Dry denies that any drums lacked covers. Bil-Dry further avers that the material in the drum was not hazardous waste.

60. Bil-Dry admits that such a containment system was not present, but affirmatively avers that it was not required as the materials were not hazardous wastes.

61. Denied as untrue.

COUNT IX

62. No response is required.

63. The allegation is a statement of law to which no response is required.

64. Bil-Dry denies that such a filing was necessary, as the materials were not hazardous waste.

65. Denied as untrue.

CIVIL PENALTY ASSESSMENT

Bil-Dry asserts that no such penalties are due as Bil-Dry's actions at the premises were not a violation of RCRA or any other law. Bil-Dry also states that the penalties assessed by the EPA are excessive and unreasonable, and are in no way related to the activities carried on by Bil-Dry at the premises. Bil-Dry further asserts that it is a small company with little money, and the penalty assessed by the EPA jeopardizes the company's existence.

REQUEST FOR SETTLEMENT CONFERENCE

Bil-Dry requests a settlement conference to discuss and clarify the issues identified in the Complaint.

REQUEST FOR HEARING

Bil-Dry requests a formal hearing on the matters contained in the Complaint.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Glenn R. Matecun", written over a horizontal line.

Glenn R. Matecun
3505 West Grand River
Howell, Michigan 48843
(517) 546-8269

**BEFORE THE UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION III**

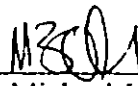
In Re:

**Bil-Dry Corporation
5525 Grays Avenue
Philadelphia, Pennsylvania 19143**

Docket No. RCRA-III-264

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he caused Defendant's Answer and Certificate of Service to be served upon Regional Hearing Clerk (3RC00), EPA Region III, 841 Chestnut Building, Philadelphia, Pennsylvania 19107 and Neil R. Bigioni, Esquire, United States Environmental Protection Agency, 841 Chestnut Building, Philadelphia, Pennsylvania 19107 through first-class mail with pre-paid postage on October 30, 1996.



Michael J. Olson

12/13/96
Fax &
overnight mail

BIL-DRY CORPORATION

**Corporate Office
3505 W. Grand River
Howell, Michigan 48843**

Telephone: (517) 546-8269

Telecopier: (517) 548-5162

Neil R. Bigioni, Esquire
Assistant Regional Counsel
United States EPA
841 Chestnut Street (3RC32)
Philadelphia, Pennsylvania 19107

Re: Bil-Dry Corporation Response Letter

Dear Mr. Bigioni:

This letter is in response to your letter dated December 6, 1996. Initially, we believe that our response was adequate given the breadth of your requests and the information we have to work with. We did not attach exhibits to our original response because of copier problems. The copier is working now and the exhibits are attached. The following is an item-by-item response to your comments and requests:

1. Your assumption is correct, that the inventory list referred to in our letter is the list previously submitted to the inspectors at the time they visited Bil-Dry.

With respect to the "raw materials" issue, (A) all of the materials are raw materials (to clarify "overage", this refers to unpackaged finished goods, i.e., material awaiting packaging for any number of different reasons which I would be glad to discuss with you); (B) No, these materials are not referenced in the inventory previously submitted. The inventory previously submitted is the inventory of the Harrod Paint material only, as we already said in our response to 1(c). Other raw materials are purchased from various suppliers, as shown on the attached list of suppliers (Exhibit 1(b)); (C) The materials reflected on the previously submitted inventory are Harrod Paint materials only; (D) There is no date on the inventory -- it most likely dates back to when the purchase took place, sometime in late 1985 or early 1986; (E) I am somewhat confused at your statement that question 1.a. requests the materials currently stored in the open roofed area or connected yard, not stored there at some indeterminate past time. The question directly from the letter is:

For each container which is now, or was at any time since acquisition of the Facility by Bil-Dry, stored in the open roofed structure or connecting open yard . . .

In any event, the drums are constantly changing, especially in light of our agreement to dispose of these materials. At this time, there are no drums in the open roofed area or "connecting yard", as I understand your definition of that area. At the date of your original letter, the drums in the "connecting yard" were either empty drums or were drums being used as trash receptacles. There were no drums containing material in this area. The drums which were stored in the open roofed area are listed in attached Exhibit 1(e). The material in these drums has been properly disposed, as set forth in the manifests attached in response to your questions below, or is awaiting approval from the disposal company.

(F) We have disposed of materials, as specifically set forth in our letter to the Commonwealth of Pennsylvania, which was also sent to the EPA. The quantity has changed: (a) The materials which are no longer present have either been disposed as shown by the attached manifests or used in Bil-Dry's production; (b) No materials have been added to either of the areas;

(G) "Overage materials" are defined in our original letter and above in 1(A), but maybe an example will help clarify this term. These materials are finished goods which have not yet been packaged. For example, consider this scenario: Bil-Dry has an order for 20 drums of adhesive. After packaging the batch, Bil-Dry ends up with an extra 1/2 drum, which was not ordered by the customer. This extra 1/2 drum of material is what we term "overage" and is stored until the next batch of adhesive is ordered, at which time it is either introduced into the batch or the 1/2 drum is completely filled. That is what we consider "overage".

2. Based on a review of the materials, Bil-Dry developed attached Exhibit 1(e) which breaks the materials down into several categories, for testing and evaluation, based upon the type of material and the anticipated use of the materials. The following are descriptions of each category:

Solvents: Solvents are referenced by an "S" code on attached Exhibit 1(e). Solvents are currently used in Concrete Stain Remover and also to vary the consistency in Asphalt Crack Filler. Solvents are also used generally as paint thinners as needed. Prior products in which solvents were used are Masonry/Concrete Stain and Silicone Clear Penetrating Water Repellent Treatment, which are not currently being produced by Bil-Dry. A further use of the solvents is in producing paints for Bil-Dry's own use at the property. Finally, Bil-Dry has been in the paint business and has always intended to extend its current product line with additional paints which utilize solvents.

Resins: Resins are referenced by an "R" code on attached Exhibit 1(e). Resins are not currently used in Bil-Dry's production, but were used in the past in Masonry/Concrete Stain and Silicone Clear Penetrating Water Repellent Treatment. Bil-Dry has been in the paint business and has always intended to extend its current product line with additional paints which utilize these resins.

Mirasol Resins/Solvents: These are identified on Exhibit 1(e) as "M1". These are paint precursors used to make paint. Bil-Dry has been in the paint business and has always intended to extend its current product line with additional paints which utilize these paint precursors.

Miscellaneous Precursors: These are identified on Exhibit 1(e) as "M2". Again, these are miscellaneous paint precursors used to make paint. Bil-Dry has been in the paint business and has always intended to extend its current product line with additional paints which utilize these paint precursors.

4. Based on your questions, there is some clarification needed here. (A) With reference to the previously submitted inventory, all of the drums had markings and no one removed those markings -- what I did not say in my original letter is that we have added coding or markings to the drums since acquisition to group "like" materials together and have a uniform system to reference those drums; (B) In addition to the previously submitted inventory, it is also true that Bil-Dry has not removed markings from any of the drums it has acquired. You ask to "describe in detail" these drums, but it is impossible to do because there have been so many drums in and out of Bil-Dry over the years; (C) With respect to the Harrod Paint drums, the acquisition was in late 1985 or early 1986, as stated above. With respect to all other drums at Bil-Dry's facility, again, it is impossible to determine acquisition dates of all the materials because there have been so many drums in and out of the company; (D) All of the terms are used as means of identifying drums, and I was using the terms interchangeably.

5. See attached Exhibit 5, which are the test results.

6. I have great concern over your statement. We have attached as Exhibit 6 all documents responsive to numbers 2, 3, 4 and 13 in your previous letter. However, we still cannot specifically identify the drums you call EPA #1-7. Your letter says that Bil-Dry was instructed not to remove the tags or the drums. This is not true according to George Sode who was at the inspection. In fact, this is totally inconsistent with the May 30, 1996 letter from the Pennsylvania Department of Environmental Protection which demanded that Bil-Dry dispose of all of the material. This letter was copied to Ms. Zelma Muldanato of the EPA (See attached Exhibit 6A).

7. As set forth in 6, above, I believe the material in the drums has been disposed. We have no problem identifying them if you can give us detail on the drum markings. These markings were pointed out to inspectors and the inspectors were told at the time to refer to the inventory, and I would assume they have notes on which EPA # matched with which drum number.

You have asked for a significant amount of information over a long period of time and I have done my best to respond in full. If you have other specifics which you would like to know, please let me know. Also, I made certain requests of the EPA in my

letter, but none of those requests were answered. Specifically, I believe that it is only fair that you let me know the following information:

1. Exactly what materials do you consider wastes and which materials does the EPA believe were hazardous wastes?

2. For each material identified in number 1, above, why does the EPA believe that the material is a waste -- that is, how come the EPA believes the material is unusable?

You have made extremely serious allegations against Bil-Dry, and the resulting penalty would put us out of business. I think it is only fair that you give me details of why you have done this.

*

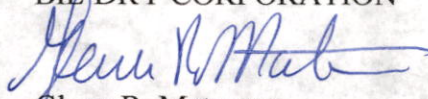
*

*

Based on the fact that you have not given me details of what you consider hazardous wastes and why, I do not believe that it would be productive at this time to go forward with the settlement conference which was scheduled for December 18, 1996. Maybe we can reschedule the conference at some later date when it would be more productive. Please call me if you have any questions.

Very truly yours,

BIL-DRY CORPORATION



Glenn R. Matecun

EXHIBIT LIST

EXHIBIT 1(b): List of Suppliers

EXHIBIT 1(e): Drum Listing With Categories

EXHIBIT 5: Test Results/Profiles

EXHIBIT 6: Disposal Manifests

EXHIBIT 6A: Letter from Pennsylvania Dep't of Environmental Protection

ASHLAND CHEMICAL
Product

Amyl Acetate
CALFOAM SLS-30
DIISOBUTYL KETONE
SAB 10 ANTIFOAM
ETHYLENE GLYCOL
GLYCOL ETHER DB
IGEPAL CA 620 (TRITON X-114)
KODOL DE. (SHELL SOL 340)
MORPHOLINE
PYAMUL 97-997
SANTICIZER 160
SYNTHENUL 40-401
TRIETHANOLAMINE 99%
UCAR 163
UCAR 413 (AIR BOND CP67)

Hg-GRABE
Product

KOLB Flo-Asphalt 20012

SPRAY LUBE
Product

CONCRETE PROTECTOR

AIR Products
Product

AIR BOND CP67
AIR FLEX CP41
AIR FLEX CP40

TEXTILE CHEMICAL
Product

SILICONE SAB 10
TAMOL #983-35%
TRIETHANOLAMINE 99%
MORPHOLINE

HENKEL
Product

NOPECO NXZ
RHEOTHIK 80-11

HULS AMERICA
Product

NUOSEPT 95
NUOCIDE 4048

CITRUS ALIÉS
Product

SPERMINT FRAGRANCE
WATER SOLUBLE - 1302

CALGENE
Product

CANOLA OIL 1102

Chemical Assos.
Product

EMERSON 871 ISOSTEARIC A.S.

1(e)

BIL-DRY CORPORATION: DRUM LISTING

DISPOSITION	DESCRIPTION
S2	AROMATIC SOLVENT
S2	MINERAL SPIRITS
S2	RESIN SOLUTION
S2	RESIN/SOLVENT
S2	RESIN/SOLVENT
S2	SOLVENT
S2	SOLVENT
S2	ETHANOL
S2	PAINT THINNER
S1	11-1348 DD, SOLVENT
S1	ETHANOL NA 1993
S1	4479, ASHLAND CHEMICALS, 870,600, AROLON 585
S1	ACETONE
S1	ACETONE
S1	ACETONE
S1	AIRFLEX 525BP
S1	BARRIER RABCO 28 S011 NAP
S1	SOLVENT
S1	SOLVENT
S1	ETHANOL
S1	UN1993
S1	HI-SOL 10 UN1255
S1	MINERAL SPIRITS
S1	XYLENE
S1	SOLVENT
S1	SOLVENT
S1	TEXANOL
S1	XYLOL
S1	MIRASOL RESIN/SOLVENT
R4	UNIREZ 770
R4	UNIREZ 770
R4	UNIREZ 770
R4	UNIREZ 770
R4	UNIREZ 770
R4	ALKYD
R4	ALKYD
R4	ALKYD
R3	60%ALKYD
R3	4479, 820-550 ALKYD
R3	4479, A 60M ALKYD
R3	BAKING ENAMEL 480X50
R3	BAKING ENAMEL 480X50
R3	4909 ALKYD 10-0500 (FACTORY SEALED = F.S.)
R3	4909 ALKYD 10-0500 F.S.
R3	4909 ALKYD 10-0500 F.S.
R3	4909 ALKYD 10-0500 F.S.

BIL-DRY CORPORATION: DRUM LISTING

R3	4909 ALKYD 10-0500 F.S.
R3	4909 ALKYD F.S.
R3	4909 ALKYD F.S.
R3	65 ALKYD, 0-263324
R3	A-69-M, D01100, 259, 0-263324, 820-550, 60M ALKYD 600K
R3	C-56 ARALDITE 471X-75 EPOXY RESIN SOLUTION
R3	EPOXY RESIN
R3	EPOXY; RESIN SOLUTION
R3	KOPREZ70-0, 4479
R3	UN1866 RESIN SOLUTION
R3	RESIN SOLUTION MIRASOL
R1	0-263324,820-550
R1	BAKING ENAMEL '480X50
R1	77480
R1	60M ALKYD 600K 4479, 820-550
R1	GH-20
R1	875-01 ASHLAND CHEMICAL
R1	A2090
R1	A2090
R1	ACRYSOL R&H
R1	ALKYD BY COMPARISION
R1	ALKYD BY COMPARISION
R1	A-2098 L.M.D.
R1	CARGILL 62
R1	COATING RESIN SOLUTION
R1	PEACOCK LABS RESIN
R1	PEACOCK LABS RESIN
R1	ALKYD/RESIN
R1	BAKING ENAMEL 480X50
R1	CELLOKYD 9528 EGB
M1	MIRASOL 11-1348
M1	MIRASOL 11-1348 DD EPOXY RESIN
M1	MIRASOL 11-1348DD RESIN SOLUTION
M1	MIRASOL 11-1348DD RESIN SOLUTION
M1	MIRASOL 12-8119
M1	MIRASOL P7098
M1	MIRASOL RESIN SOLUTION 11-1348DD
M1	MIRASOL RESIN SOLUTION 11-1348DD
M1	MIRASOL RESIN SOLUTION 11-1348DD
M1	MIRASOL RESIN SOLUTION 11-1348DD
M1	MIRASOL RESIN SOLUTION 11-1348DD
M1	RESIN SOLUTION, 38-406, 7-5-3880 CHEMICAL COMPOUNDS
M1	RESIN SOLUTION PEACOCK LABS MIRASOL
M1	RESIN SOLUTION 11-1348 DD UN1866
M1	RESIN SOLUTION 1866 MIRASOL
M1	RESIN SOLUTION UN 1866
M1	RESIN SOLUTION, 11-1348DD
M2	GLYCERYL MONO OLEATE
M2	ZECO 163
M2	ZECO 163

BIL-DRY CORPORATION: DRUM LISTING

M2	BARRIER LEAR PROTECTIVE COATING, CONCRETE BARRIER TYPE A
M2	ACCROFLEX CK-1
M2	AIR PRODUCTS EMULSION
M2	AIR PRODUCTS EMULSION
M2	AKZO ESTABEX 2397
M2	AMMONIA
M2	AMMONIUM HYDROXIDE
M2	ANTISKIN WITH SOLIDS
M2	AQUA AMMONIA
M2	C 67 I.P. FLEXOL PLASTIZER
M2	COCOON SPRAYABLE PLASTIC COATING NO. 560 PAINT
M2	C-30 SPRAYABLE PLASTIC COATINGS
M2	DEFOAMER
M2	DIISODECYL PHTHALATE
M2	DRYDENE MOTOR OILS
M2	DIOCTYL PHTHALATE
M2	DIOCTYL PHTHALATE
M2	DIOCTYL PHTHALATE
M2	DIOCTYL PHTHALATE
M2	ETHYLENE GLYCOL
M2	ESTER E10L 204 UNION CARBIDE
M2	G.E. SILICONE D.F. 104
M2	LINDAU CHEMICAL, LINDRON
M2	LINDAU CHEMICALS
M2	M407 PLEXOL 201
M2	MAZER SASIL
M2	MINERAL OIL
M2	MIRASOL
M2	NUEPLAZ-PLASTICIZER DTOP TENNECO
M2	NUETRAL OIL
M2	N-324, 814 SURFACE LUB
M2	N-3768, 481, ESTER DIOL 204
M2	GRAPE CONCENTRATE (PIGMENT)
M2	PHOSPHORIC ACID
M2	PHTHALATE
M2	PLURAFAC C
M2	POLYAMID RESIN
M2	R010 ALS
M2	RABCO F.S.
M2	RAVEN BLACK S-250
M2	MIRASOL
M2	RHEOTOL
M2	SAMPLE A ALKYD 10-0500
M2	SHORT ALKYD SAMPLE B 2098 SLO
M2	SHORT ALKYD 4811
M2	SODIUM HYDROXIDE (NaOH)
M2	SODIUM SILICATE 306
M2	SPRAYABLE PLASTIC COATING
M2	THERM CHEK 3V4, FERRO CORPORATION BEDFORD CHEMICAL DIVISION
M2	THERMCHEK
M2	TRIBUTYL TIN OXIDE UN2788 F.S. A&W
M2	LINSEED OIL
M2	VARKYD 2505-60E
M2	VARKYD 2505-60E
M2	WRINKLE FINISH
M2	TROYKYD ANTI-SKIN B

BIL-DRY CORPORATION: DRUM LISTING

	M2		ETHYLENE GLYCOL
	M2		TOLUOL
	M2		MINERAL SPIRITS (INLAND CHEMICAL)